

1 STEVEN B. WOLFSON  
2 District Attorney  
**CIVIL DIVISION**  
3 State Bar No. 001565  
4 By: **MATTHEW CHRISTIAN**  
Deputy District Attorney  
State Bar No. 008024  
500 South Grand Central Pkwy.  
P. O. Box 552215  
Las Vegas, Nevada 89155-2215  
(702) 455-4761  
Fax (702) 382-5178  
7 E-Mail: Matthew.Christian@ClarkCountyDA.com

*Attorneys for Defendant JAMES R. SWEETIN*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

EDDIE WORMWOOD,  
Plaintiff,  
vs.  
NORTH LAS VEGAS POLICE  
DEPARTMENT, a political subdivision of  
the State of Nevada; CITY OF NORTH  
LAS VEGAS; FORMER CHIEF OF  
NORTH LAS VEGAS POLICE  
DEPARTMENT JOSEPH CHRONISTER  
(in his individual capacity and official  
capacity as Chief of North Las Vegas  
Police Department); DETECTIVE DAVE  
MOLNAR (individually and in his capacity  
as a police officer employed by the City of  
North Las Vegas Police Department);  
DEPUTY DISTRICT ATTORNEY  
JAMES R. SWEETEN (in his individual  
capacity); SENIOR INVESTIGATOR  
CARRIE MEADS (in her individual  
capacity); DOE OFFICERS 1 through 10  
(in their individual and official capacities),  
inclusive, and JOHN DOES 1-10,  
inclusive,  
Defendants.

Case No: 2:15-cv-01438-GMN-GWF

**JOINT STIPULATION TO STAY  
LITIGATION PENDING  
DISPOSITION OF MOTIONS TO  
DISMISS**

1                   **JOINT STIPULATION TO STAY LITIGATION PENDING DISPOSITION OF**  
 2                   **MOTIONS TO DISMISS**

3                   Defendant, Chief Deputy District Attorney James R. Sweetin (“Sweetin”), Defendants  
 4 North Las Vegas Police Department, City of North Las Vegas, and Chief Joseph Chronister  
 5 (collectively, “North Las Vegas”), and Plaintiff, Eddie Wormwood (“Plaintiff”), by and  
 6 through their undersigned counsel of record, hereby STIPULATE and AGREE AS  
 7 FOLLOWS:

8                   This is a civil rights action wherein Plaintiff alleges, *inter alia*, wrongful arrest and  
 9 malicious prosecution. Defendants Sweetin and North Las Vegas have moved to dismiss the  
 10 Complaint [Doc. ## 13, 18]. These motions are fully briefed [Doc. ## 25, 26, 27, 28].  
 11 Defendants Dave Molnar and Carrie Meads have not yet appeared.

12                  Pursuant to FRCP 26(f) and LR 26-1(d), the parties should presently conduct a  
 13 discovery scheduling conference. However, based on the nature of the case, and given the  
 14 pendency of dispositive motions and the fact that two defendants have not yet appeared,  
 15 Sweetin, North Las Vegas, and Plaintiff agree that a stay of discovery is warranted until the  
 16 motions are heard.

17                  This request is not made for the purposes of delay, but to avoid having to engage in  
 18 costly discovery in a matter that may ultimately be dismissed, even in part, by the Court. The  
 19 purpose of Federal Rule of Civil Procedure 12(b)(6) is to enable defendants to challenge the  
 20 legal sufficiency of a complaint without subjecting themselves to discovery, and the motions  
 21 to dismiss present good faith arguments that could result in relief, at least in part. *Ministerio*  
 22 *Roca Solida v. U.S. Dep’t of Fish and Wildlife*, 288 F.R.D. 500 (D. Nev. 2013).

23                  DATED this 26<sup>th</sup> day of October, 2015.

24                  STEVEN B. WOLFSON  
 25                  DISTRICT ATTORNEY

26                  By: /s/ Matthew J. Christian  
 27                  Matthew J. Christian  
 28                  500 South Grand Central Pkwy.  
                       Las Vegas, Nevada 89155-2215

28                  Attorney for Defendant James R. Sweetin

JUSTICE FORCE LAW  
 GROUP LLC

By: /s/ Zarinah Muhammad  
 Zarinah Muhammad  
 6278 Ruby Kinglet  
 Las Vegas, NV 89148

Attorney for Plaintiff

1 LEWIS BRISBOIS  
2 BISGAARD & SMITH

3 By: /s/ Robert W. Freeman  
4 Robert W. Freeman, Esq.  
5 6385 S. Rainbow Blvd., Ste. 600  
6 Las Vegas, NV 89118

7 Attorneys for North Las Vegas Police  
8 Department, City of North Las Vegas,  
9 Chief Joseph Chronister

10 **ORDER**

11 Pursuant to the STIPULATION of the parties, IT IS HEREBY ORDERED that all  
12 discovery in this matter is STAYED until the disposition of the pending motions to dismiss.

13   
14 United States Magistrate Judge

15 Date: November 3, 2015

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